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5 **TIFFANY & BOSCO, P.A.**  
6 212 S. Jones Blvd.  
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9 Attorney for Plaintiff  
10 WELLS FARGO BANK, N.A.

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 WELLS FARGO BANK, N.A., a national  
14 association,

15 **CASE NO.: 2:13-cv-01325**

16 Plaintiff,

17 **STIPULATION OF VOLUNTARY  
18 DISMISSAL**

19 vs.

20 TIMBERLAKE STREET AND  
21 LANDSCAPE MAINTENANCE  
22 ASSOCIATION; et al.

23 Defendants .

24 COMES NOW Plaintiff, Wells Fargo Bank, N.A., Defendant PREMIER ONE  
25 HOLDINGS, INC.; and Defendant LIQUN HOLDINGS LIMITED, by and through their  
26 respective counsel of record, and hereby stipulate as follows:

27 THAT Plaintiff filed its Complaint on the 25<sup>th</sup> day of July, 2013 in the United States  
28 District Court, District of Nevada as Case No. 2:13-cv-01325 [Doc. 1];

THAT Defendant Timberlake Street and Landscape Maintenance was dismissed from  
the above-entitled matter on January 8, 2014 [Doc. 28];

THAT a substantively identical matter was filed on 11<sup>th</sup> day of July, 2013 in the Eighth  
Judicial District Court, Clark County Nevada as Case No. A-13-684957-C;

THAT the prior exclusive jurisdiction doctrine applies;

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212 S. Jones Blvd.  
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1            THEREFORE pursuant to FRCP 41(a)(ii), the above-entitled action is hereby dismissed  
2 without prejudice.  
3

4            DATED this 13<sup>th</sup> day of June, 2014.

5 **TIFFANY & BOSCO, P.A.**

6            /s/ Matthew D. Dayton  
7            Matthew D. Dayton, Esq.  
8            Nevada Bar No. 11552  
9            212 S. Jones Blvd.  
10          Las Vegas NV 89107  
11          Attorney for Plaintiff  
12          Wells Fargo Bank, N.A.

5 **HONG & HONG**

6            /s/ Joseph Y. Hong  
7            Joseph Y. Hong, Esq.  
8            Nevada Bar No. 5995  
9            10781 West Twain Avenue  
10          Las Vegas, V 89135  
11          Attorney for Defendant  
12          Premier One Holdings

11 **CALLISTER & ASSOCIATES**

12            /s/ Mitchell S. Bisson  
13            Mitchell S. Bisson, Esq.  
14            Nevada Bar No. 11920  
15            823 Las Vegas, Blvd South, 5th Floor  
16            Las Vegas, NV 89101  
17            Attorneys for Defendant  
18            Liqun Holdings

17 **ORDER**

18 **IT IS SO ORDERED.**

19            DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

22            

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UNITED STATES DISTRICT COURT JUDGE

23            Respectfully Submitted:

24 **TIFFANY & BOSCO, P.A.**

25            /s/ Matthew D. Dayton  
26            MATTHEW D. DAYTON, ESQ.  
27            212 S. Jones Blvd.  
28            Las Vegas NV 89107  
              Attorney for Plaintiff

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that on this 13<sup>th</sup> day of June, 2014, he electronically served the above **STIPULATION OF VOLUNTARY DISMISSAL** to the Clerk's Office using the CM/ECF System for filing transmittal of a Notice of Electronic Filing and to all counsel in this matter; all counsel being registered to receive Electronic Filing.

/s/ Steve Black  
An employee of Tiffany & Bosco, P.A.

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